

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**THOMAS WORTLEY, individually and
on behalf of those similarly situated,**

Plaintiff,

v.

**UNITED STATES GYPSUM
COMPANY,**

Defendant.

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Civil Action No. 19-4495

**NOTICE OF JOINT MOTION TO REOPEN CASE, APPROVE SETTLEMENT,
AND DISMISS CASE WITH PREJUDICE**

Plaintiff, Thomas Wortley (“Plaintiff”) and Defendant, United States Gypsum Company (“Defendant”) (collectively referred to as the “Parties”), move this Court to grant their Joint Motion to Reopen Case Approve Settlement, and Dismiss Case with Prejudice. The Parties seek approve of the settlement pursuant to the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 201, *et seq.* The Parties base their motion upon this notice of motion and motion, the attached Joint Proposed Findings of Fact and Conclusion s of Law, and the records and pleadings in this action. In addition, the Parties submit a copy of the settlement agreement reached by the Parties with

this Notice of Motion and Motion. (Attached at Exhibit A to this Notice is a true and complete copy of the Parties' Settlement Agreement.)

Dated: July __, 2019

RESPECTFULLY SUBMITTED:

/s/ Graham F. Baird

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